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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF ARIZONA**

13  
14 Jessica Kahraman, *et al.*,  
15 Plaintiffs,  
16 v.  
17 State of Arizona, *et al.*,  
18 Defendants.

Case No.: 2:22-cv-00375-PHX-SRB

**UNCONTESTED MOTION FOR  
EXTENSION OF TIME FOR  
PLAINTIFFS TO RESPOND TO  
DEFENDANT GWYNETH KELLY'S  
MOTION FOR JUDGMENT ON THE  
PLEADINGS**

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20  
21 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LRCiv 7.3(a), Plaintiffs make this  
22 uncontested motion for an enlargement of time for Plaintiffs to file and serve their  
23 response to *Defendant Gwyneth Kelly's Motion for Judgment on the Pleadings* [Doc.  
24 153], filed on 25 August 2023. Plaintiffs make this request in good faith and not for  
25 purposes of delay.

26 Plaintiffs' lead counsel's mother passed away unexpectedly in August 2023.  
27 Counsel is the executor of her estate, located in Illinois. Unanticipated estate and  
28

1 probate issues arose this week, as did some unanticipated scheduling issues in  
 2 other matters for which counsel is responsible. Consequently, additional time is  
 3 needed to respond to Defendant Kelly's motion. The parties have conferred by  
 4 email and telephone and agree that good cause exists to extend the time for  
 5 Plaintiffs to respond to Defendants' motion up to and including 15 September  
 6 2023.

7 A proposed Order is also submitted for the Court's consideration.

8  
 9 **RESPECTFULLY SUBMITTED** this 8<sup>th</sup> day of September 2023.

10 **MILLS + WOODS LAW PLLC**

11 By /s/ Thomas A. Connelly

12 Thomas A. Connelly

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21 *Attorneys for Plaintiffs*

22 **CERTIFICATE OF SERVICE**

23 I hereby certify that on September 8, 2023, I electronically transmitted the  
 24 foregoing document to be filed electronically with the Clerk's Office through the  
 25 CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be  
 26 served on all counsel of record via the Court's CM/ECF system.

27  
 28 /s/ Thomas A. Connelly

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